UNITED STATES DISTRICT COURT DISTRICT OF SOUTH CAROLINA COLUMBIA DIVISION

Twanda Marshinda Brown, et al.,

Plaintiffs,

v.

Lexington County, South Carolina, et al.,

Defendants.

Civil Action No. 3:17-cv-01426-MBS

STIPULATION OF AUTHENTICITY AND ADMISSIBILITY OF EVIDENCE

On or about November 2, 2018, while the parties were working to mediate this matter, South Carolina Court Administration (SCCA) Staff Attorney Renee Lipson sent a collection of SCCA documents to The Honorable Shiva V. Hodges, who was serving as mediator. *See* Bates Nos. SCCA-000001–112. Magistrate Judge Hodges then shared the documents with all parties as part of mediation efforts.

The parties hereby stipulate to the authenticity of these documents and that the documents and any testimony or arguments related to the documents may be admitted as evidence at trial. In so stipulating, the parties do not waive any other aspect of the confidentiality of the mediation process as set forth in Local Rule 16.08(C). In addition, Defendants do not waive any other aspect of confidentiality of any other communications between or among officials or employees of the South Carolina Judicial Branch, including South Carolina Court Administration and county magistrates and persons under the direction and control of county magistrates.

It is further stipulated that the aforementioned documents, SCCA-000001–112, as well as this stipulation, may be filed by either party at the time of filing of dispositive motions, and at trial, if the case goes to trial.

DATED this 4th day of June, 2021.

Respectfully submitted by,

By: s/ Allen Chaney

ALLEN CHANEY, (Fed. No. 13181)

South Carolina Justice Project 1220 Laurens Road, Ste B

Greenville, SC 29607

Telephone: (864) 565-9998

Email: allen@scjusticeproject.org

ORION DANJUMA, Admitted Pro Hac Vice AMERICAN CIVIL LIBERTIES UNION FOUNDATION

125 Broad Street, 18th Floor New York, New York 10004

Telephone: (212) 549-2663 Facsimile: (212) 549-2651

Email: odanjuma@aclu.org

TOBY J. MARSHALL, Admitted Pro Hac Vice ERIC R. NUSSER, Admitted Pro Hac Vice

TERRELL MARSHALL LAW

GROUP PLLC

936 North 34th Street, Suite 300

Seattle, Washington 98103

Telephone: (206) 816-6603 Facsimile: (206) 319-5450

Email: tmarshall@terrellmarshall.com

Email: eric@terrellmarshall.com

Attorneys for Plaintiffs

BY: s/ Kenneth P. Woodington

William H. Davidson, (Fed. Bar #425) Kenneth P. Woodington, (Fed. Bar #4741)

DAVIDSON, WREN & DEMASTERS, P.A.

1611 Devonshire Drive, 2nd Floor

Post Office Box 8568

Columbia, South Carolina 29202-8568 Email: wdavidson@dml-law.com

Email: kwoodington@dml-law.com

Telephone: (803) 806-8222 Facsimile: (803) 806-8855

Attorneys for Defendants